

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
Curtis Hurst	:	Chapter 13
	:	
	:	
Debtor	:	Case No.: 18-15461MDC

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**EXPEDITED MOTION TO RECONSIDER DISMISSAL AND REINSTATE  
BANKRUPTCY CASE**

The Debtor hereby respectfully requests this Honorable Court to reconsider its Order dismissing the Debtor's Chapter 13 Bankruptcy, and avers the following:

1. The Debtor filed the instant Chapter 13 Bankruptcy on or about August 17<sup>th</sup>, 2018.
2. On or about February 28<sup>th</sup>, 2019 Debtor's case was dismissed for failure to make all required Plan payments.
3. Debtor did make a payment subsequent to dismissal on March 9<sup>th</sup>, 2019.
4. This was confirmed by Debtor's Counsel, that the Standing Chapter 13 Trustee received and is holding in its suspense account an additional \$930.00, that was received after the dismissal of the case.
5. The Debtor additionally is now in better health and is able to remain current on his monthly payments if given the opportunity to save his home.
6. Although the Debtor did sign a Consent Order in this case, barring future new filings without leave of Court, the Debtor is not filing a new bankruptcy, he is humbly asking that the dismissal of his current Bankruptcy be reconsidered.

7. Additionally, the Debtor will become fully current by the date of this hearing, in hopes that this Honorable Court will allow his case to be reinstated.
8. The Debtor believes that if this Honorable Court were to reconsider its Order dismissing his case and reinstate it, that he would continue to remain current on his Trustee Plan payments and successfully complete his Chapter 13 Plan.
9. The Debtor is requesting an Expedited hearing on this motion because the Debtor has a Sheriff's Sale of his home scheduled for **April 12<sup>th</sup>, 2019**.

WHEREFORE, the Debtor humbly requests that this Court reconsider its Order dismissing the instant Chapter 13 Bankruptcy, and reinstate the Debtor's Bankruptcy case.

Dated: March 28, 2019

/s/Brad J. Sadek, Esq  
Brad J. Sadek, Esq.  
Attorney for Debtor  
Sadek and Cooper  
1315 Walnut Street, #502  
Philadelphia, PA 19107  
215-545-0008